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7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 JAMES M. REESE,

11 Plaintiff,

12 vs.

13 CLARK COUNTY DETENTION CENTER, et al,

14 Defendants.
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CASE NO: 2:15-cv-01633-GMN-VCF

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANTS'
MOTION FOR SUMMARY
JUDGMENT AND EXTENSION FOR
DEFENDANTS TO REPLY**

(SECOND REQUEST)

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17 COMES NOW, Plaintiff, JAMES M. REESE, (hereinafter, "Plaintiff"), by and through his
18 counsel, the law firm of Hatfield & Associates, Ltd., and Defendants¹ Parole Board members
19 CONNIE BISBEE, ED GRAY, JR., and MICHAEL KEELER, Parole Board employee DARLA
20 FOLEY, and Parole & Probation Officers TODD KAYLOR, JONI BILLICH and MICHAEL
21 SLIVA (hereinafter collectively "Defendants"), by and through its counsel, Adam Paul Laxalt,
22 Nevada Attorney General, and Michael M. Miles, Nevada Deputy Attorney General, and do hereby
23 stipulate and agree to extend the time for Plaintiff to respond to Defendants' Motion for Summary
24 Judgment [ECF #75] and the time for Defendant to Reply to Plaintiff's Response.
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28 ¹ Defendants have been captioned CLARK COUNTY DETENTION CENTER, *et al* by the Court. Plaintiff intends to move to conform and amend the caption accordingly.

1 This request is submitted pursuant to LR IA 6-1, 6-2 and LR II 7-1 and 26-4 and is the
2 parties' second request for an extension concerning an extension of the time for Plaintiff to respond
3 to Defendants' Motion for Summary Judgment.

4 This request is made as Plaintiff has been unable to meet with Plaintiff's counsel due to an
5 extensive work schedule and out-of-state travel for a new job, and conflicts with Plaintiff's counsel's
6 schedule and ability to meet with Plaintiff. Accordingly, Plaintiff shall have an additional six (6)
7 days up to and including March 14, 2018 to respond to Defendant's Motion and Defendants shall
8 have up to and including April 6, 2018 to file a Reply, to accommodate Defendants' counsel's
9 planned vacation.
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11 In addition, a settlement conference is scheduled for March 21, 2018 and settlement briefs
12 are due to the Court March 14, 2018 per this Court's ORDER, [ECF #77]. The parties have agreed
13 to stipulate that Defendant shall have until March 16, 2018, by 4:00 p.m., to provide Defendant's
14 settlement brief to the Court to provide time for Defendant to review Plaintiff's response to
15 Defendants' Motion for Summary Judgment on March 14, 2018. Plaintiff will propose a separate
16 stipulation and order to the Magistrate Judge for review of the proposed extension of the time for
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1 Defendants to provide their settlement conference brief to the Court.

2 Dated: March 9, 2018.

Dated: March 9, 2018.

3 ADAM PAUL LAXALT
4 Attorney General

HATFIELD & ASSOCIATES, LTD.

5 /s/ Michael M. Miles

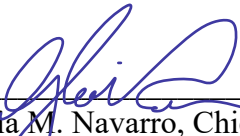
/s/ Trevor J. Hatfield

6 Michael M. Miles, Esq. (SBN 10932)
7 Deputy Attorney General
8 State of Nevada
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12 **IT IS SO ORDERED.**

13 Dated this 14 day of March, 2018.

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16 Gloria M. Navarro, Chief Judge
17 UNITED STATES DISTRICT COURT
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CERTIFICATE OF SERVICE

I certify that on March 8, 2018, I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT AND EXTENSION FOR DEFENDANTS TO REPLY (SECOND REQUEST)** with the Clerk of the Court using the ECF system which served the parties hereto electronically.

Dated this 9th day of March 2018.

HATFIELD & ASSOCIATES, LTD.

By: */s/ Trevor J. Hatfield*

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